

Richard M. Heimann (State Bar No. 63607)
Kelly M. Dermody (State Bar No. 171716)
Brendan Glackin (State Bar No. 199643)
Dean Harvey (State Bar No. 250298)
Anne B. Shaver (State Bar No. 255928)
LIEFF CABRASER HEIMANN & BERNSTEIN, LLP
275 Battery Street, 29th Floor
San Francisco, California 94111-3339
Telephone: (415) 956-1000
Facsimile: (415) 956-1008

Joseph R. Saveri (State Bar No. 130064)
James Dallal (State Bar No. 277826)
JOSEPH SAVERI LAW FIRM
505 Montgomery St., Suite 625
San Francisco, CA 94111
Telephone: (415) 500-6800
Facsimile: (415) 500-6803

Co-Lead Class Counsel

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

IN RE: HIGH-TECH EMPLOYEE
ANTITRUST LITIGATION

THIS DOCUMENT RELATES TO:
ALL ACTIONS

Master Docket No. 11-CV-2509-LHK

**DECLARATION OF DEAN M.
HARVEY IN SUPPORT OF
PLAINTIFFS' ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
PORTIONS OF EXHIBIT C AND
ATTACHMENT 1 TO THE
SETTLEMENT AGREEMENT**

1 I, Dean M. Harvey, declare:

2 I am a partner in the law firm of Lief, Cabraser, Heimann & Bernstein, LLP, a member of
3 the State Bar of California, and am admitted to practice before the United States District Court for
4 the Northern District of California. I am one of the counsel for Plaintiffs and the Class in this
5 action. I make this declaration based on my own personal knowledge. If called upon to testify, I
6 could and would testify competently to the truth of the matters stated herein.

7 1. I have electronically filed under seal true and correct unredacted versions of
8 Exhibit C and Attachment 1 pursuant to the Court's procedures for requesting a sealing order.

9 2. Attached hereto as Exhibit 1 is a true and correct copy of the Fifth Circuit's
10 October 16, 2013 order issued in *In re Deepwater Horizon – Appeals of the Economic and*
11 *Property Damage Class Action Settlement*, Case 13-30095 (5th Cir.).

12 3. Attached hereto as Exhibit 2 is a true and correct copy of the Settlement
13 Agreement in *In re AXA Rosenberg Investor Litig.*, Case 11-00536-JSW (N.D. Cal. Nov. 1, 2011)
14 (Dkt. 59).

15 4. Attached hereto as Exhibit 3 is a true and correct copy of the district court's
16 December 6, 2011 preliminary approval order issued in *In re AXA Rosenberg Investor Litig.*, Case
17 11-00536-JSW (N.D. Cal.).

18 5. Attached hereto as Exhibit 4 is a true and correct copy of the district court's April
19 2, 2012 final approval order issued in *In re AXA Rosenberg Investor Litig.*, Case 11-00536-JSW
20 (N.D. Cal.).

21 6. Attached hereto as Exhibit 5 is a true and correct copy of the district court's May
22 1, 2008 preliminary approval order issued in *Amochaev et al. v. Citigroup Global Markets, Inc.*,
23 Case 05-cv-01298-PJH (N.D. Cal.).

24 7. Attached hereto as Exhibit 6 is a true and correct copy of the January 16, 2013
25 Order Granting Lead Plaintiffs' Application to File Under Seal, issued in *In re A-Power Energy*
26 *Generations Sys., LTD. Sec. Litig.*, Case No. 2:11-ML-2302 GW (C.D. Cal.).

27 8. Attached hereto as Exhibit 7 is a true and correct copy of the trial court's May 30,
28 2008 sealing order in *John Muir Uninsured Healthcare Cases*, J.C.C.P. 4494 (Cal. Super. Ct.).

1 I declare under penalty of perjury under the laws of the United States that the foregoing is
2 true and correct.

3 Executed this 15th day of January, 2015 in San Francisco, California.

4 LIEFF CABRASER HEIMANN & BERNSTEIN, LLP

5
6 By: /s/ Dean M. Harvey
Dean M. Harvey